FEDERAL COMMUNICATIONS COMMISSION WASHINGTON D.C.

COMMENTS REGARDING PROCEEDING 05-235. REGARDING NPR TO ELIMINATE MORSE CODE TESTING AS A PREREQUISITE TO OBTAIN GENERAL AND AMATEUR **EXTRA** CLASS LICENSES IN THE U.S. AMATEUR SERVICE

October 27, 2005

Much has been written regarding the Commission's decision to issue a Notice of Proposed Rulemaking ("NPR") to eliminate the requirement to demonstrate proficiency in Morse code for Amateurs to be granted General and Amateur Extra class licenses, and have access to HF bands.

It is important to observe that the International Telecommunications Union (at WRC-03) ceased requiring member states to administer Morse code examinations. Several countries have acted quickly and lifted testing requirements. There is no indication those foreign Amateur Services suffered or had their capacities diminished by the elimination of the Code testing requirement.

I believe it is important to balance competing interests. In other words, what is gained from keeping the requirement?

Current requirements simply ensure that at the time of Element one (1) testing, successful examinees were able to receive by ear, telegraphy at 5 words per minute. There is no guarantee those persons will keep up or improve their skills in telegraphy at any time, ever, after passing the element one telegraphy test.

Continuous wave is one of several transmission modes that members of the Amateur Service use to communicate. With the advent and active development of other modes, demonstration of Morse code proficiency may no longer serve a useful purpose, and in fact serves as a barrier to entry, of well meaning candidates who would enter the Amateur Service but for the Code requirement.

Another aspect that must be considered is that, demographically, the Amateur Service is getting older. Mindful of its mission, the American Radio Relay League is making valiant strides to introduce scores of young Americans to the Amateur Service, and the League should be commended for its actions.

FCC Regulations (Part 97.1) state that their purpose is to provide an Amateur Radio Service that provides, among others:

- 1. Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.
- 2. Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

Nothing in perpetuating Morse code testing requirements advances either of the above stated objectives of the Amateur Radio Service.

The Commission ought not to forget the main purposes for establishing the Amateur Service and allocating to it valuable electromagnetic spectrum. If we are to recognize the importance of the Service, and not only maintain, but enlarge a pool of trained radio operators that can put its services forth during times of national emergencies and disasters, we must do everything possible to make sure that younger Americans are continuously filling those ranks. I find it doubtful that anyone (young or old) will say that Morse code operates as an enticement to enter the Amateur Service.

In so doing, the Commission should focus on what the Amateur Service should look like in the 21^{st} century. Things ought not to be done simply because they have been done in that way since times immemorial. Or put in another way, should we let progress be hampered by tradition?

Accordingly, I endorse the Commission's NPR to eliminate any requirements to demonstrate Morse Code proficiency for access to HF Bands, or as a requirement to obtain General or Extra Class licenses.

Respectfully submitted,

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